

**EXHIBIT C**

**Jayne L. Freeman**

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**From:** Jayne L. Freeman  
**Sent:** Thursday, April 12, 2018 11:46 AM  
**To:** 'joe@joethomas.org'; Derek C. Chen  
**Cc:** LaHoma Walker  
**Subject:** RE: Dalessio adv. UW - Court's order; Plaintiff's Motion for Joinder

Joe: you continue to misunderstand the difference between representatives of an agency and parties to a lawsuit. Previously (and to date), the only Defendant in this lawsuit was the University of Washington, who I have been appointed to defend. The afore-mentioned individuals were client representatives of the sole Defendant, the University, and thus could be reached through my office. As you are undoubtedly aware, not every employee of an agency is a client representative; however, the agency does have to have actual people who can appear on its behalf to provide information—agents are different than parties.

At this point, you are planning to file an Amended Complaint in which Plaintiff is making new allegations and claims against some additional parties. The Amended Complaint has not yet been filed. No additional parties have been served. These individuals are not currently parties to the lawsuit. There is a process that must be followed before any formal appearance can be made on their behalf in litigation. Surely you can appreciate that individuals have their own rights if they are sued directly and made Defendant-parties to a lawsuit as opposed to simply witnesses. You have also filed a Motion to "Join" additional parties, and after initially indicating you would be striking it, you told us that you felt you still needed to pursue that motion before adding new Defendants. This is confusing, but we are simply awaiting whatever process you choose to follow. Filing Plaintiff's Amended Complaint does not require any action by my office.

Regarding "document #293876", a copy of Defendant University of Washington's Initial Disclosure pleading dated June 1, 2017, you should find a copy of this document in the courtesy copies we provided to you last month: please look in the file labeled: **Discovery**, then inside the subfile labeled "**6-1-2017**". It is the second-to-last .pdf document titled "**Def UW's Initial Disclosures**". You will notice it is identical to the copy of Defendant's Initial Disclosures that was served on your client on June 1, 2017 and that she passed along to you (please note the footer in the lower left corner that labeled the document #287625 when it was generated on our computer system in Word format. The number #293876 in the email attachment is simply a re-naming device auto-generated by our computer system when the document was re-saved as a .pdf into a separate discovery for internal organizational purposes. When documents are emailed directly from the system as an attachment, they appear with such an auto-generated number. Our assistant spent additional time to copy over all of the pleadings and discovery with text titles instead of just numbers to make it easier for you to identify documents.

I do not appreciate the constant accusations when we have tried repeatedly to work cooperatively to simplify matters, and you do not appear to read pleadings (i.e. the court's most recent scheduling orders) or understand civil procedure. If you have a question, just ask.

P.s. While I am not obligated to assist you in your endeavors to sue my client or its employees, if you would like to forward FRCP 4 waivers of service after the Amended Complaint has been filed, I am happy to pass them along to the University; if and when I (or any other attorney) is appointed to defend the individual Defendants after a lawsuit has been filed against them, the individual parties can decide if they agree to waive service or allow appointed counsel to accept service for them. While I was typing this email, it appears you may have filed the Amended Complaint; obviously, I haven't had a chance to review it, but we will take a look.

*Jayne L. Freeman*

**KBM** KEATING, BUCKLIN  
& McCORMACK

801 Second Avenue, Suite 1210

Seattle, WA 98104

Office: (206)623-8861

FAX: (206)223-9423

[jfreeman@kbmlawyers.com](mailto:jfreeman@kbmlawyers.com)

[www.kbmlawyers.com](http://www.kbmlawyers.com)

(Please note our new address)

**From:** joe@joethomas.org [mailto:joe@joethomas.org]

**Sent:** Thursday, April 12, 2018 10:50 AM

**To:** Jayne L. Freeman <JFreeman@kbmlawyers.com>; Derek C. Chen <DChen@kbmlawyers.com>

**Cc:** LaHoma Walker <LWalker@kbmlawyers.com>; 'JULIE' <juliedalessio@msn.com>

**Subject:** RE: Dalessio adv. UW - Court's order; Plaintiff's Motion for Joinder

Dear Jayne:

We need to meet and confer about what appears to be inconsistent statements made by you, Jayne, during the course of this litigation to Ms. Dalessio when she was pro se in initial disclosures that were signed by you, and then in your previous email to me today.

Ms. Dalessio claims that the attached file, file number 293876, was provided to her as initial disclosures in this lawsuit, pursuant to Rule 26(a). See attached document 293876. In document 283876, dated June 01, 2017, it clearly and unambiguously states that the following individuals would have discoverable information for this lawsuit: Mr. Perry Tapper, Ms. Eliza Saunders, Mr. Andrew Palmer and Ms. Alison Swenson. Under each person's name, instead of that person's mailing address and contact information, the initial disclosures give the mailing address and contact information for Keating, Bucklin & McCormack, Inc., P.S. It is alarming that you would indicate to Ms. Dalessio that Keating, Bucklin & McCormack, Inc., P.S. are representing, in some capacity, the above named individuals, and then not make the same representations to me.

Moreover, it is even more alarming that this document, 293876, which appears to be initial disclosures in this matter was not on the flash drive that your office sent to me. I am concerned that this might be a deliberate omission in your email this morning and in the flash drive your office sent me.

This needs to be cleared up immediately because if Plaintiff's Motion for Joinder is granted, then the above named individuals need to be served with a summons and complaint. This directly affects the administration of justice.

If this is indeed inconsistent statements to Ms. Dalessio and myself, this would be a clear violation of Rule 11.

Please respond today.

Very truly yours,

Joe

Joseph Thomas

Law Office of Joseph Thomas PLLC

14625 SE. 176th ST., Apt. # N101

Renton, Washington 98058



Phone: (206) 390-8848  
Website: <http://JoeThomas.org>

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**From:** Jayne L. Freeman <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>  
**Sent:** Thursday, April 12, 2018 8:45 AM  
**To:** [joe@joethomas.org](mailto:joe@joethomas.org); Derek C. Chen <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>  
**Cc:** LaHoma Walker <[LWalker@kbmlawyers.com](mailto:LWalker@kbmlawyers.com)>  
**Subject:** RE: Dalessio adv. UW - Court's order; Plaintiff's Motion for Joinder

If and when I represent any party in any action, you will be notified by a Notice of Appearance. You should not be entering any information regarding me or my law firm's representation of anyone in the ECF system absent such notice. Thank you.

*Jayne L. Freeman*  
**KBM** KEATING, BUCKLIN  
& McCORMACK  
801 Second Avenue, Suite 1210  
Seattle, WA 98104  
Office: (206)623-8861  
FAX: (206)223-9423  
[jfreeman@kbmlawyers.com](mailto:jfreeman@kbmlawyers.com)

[www.kbmlawyers.com](http://www.kbmlawyers.com)  
(Please note our new address)

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**From:** [joe@joethomas.org](mailto:joe@joethomas.org) [mailto:[joe@joethomas.org](mailto:joe@joethomas.org)]  
**Sent:** Wednesday, April 11, 2018 3:16 PM  
**To:** Jayne L. Freeman <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>; Derek C. Chen <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>  
**Cc:** LaHoma Walker <[LWalker@kbmlawyers.com](mailto:LWalker@kbmlawyers.com)>  
**Subject:** RE: Dalessio adv. UW - Court's order; Plaintiff's Motion for Joinder

Dear Jayne,

I am trying to file the amended complaint in the PACER EM/ECF system. The CM/ECF is asking me about new parties. Is your law firm representing: Ms. Eliza Saunders, Ms. Alison Swenson, Mr. Perry Tapper, and Mr. Andrew Palmer? I want to be able to correctly enter the information into the PACER CM/ECF system.

Thank you for your anticipated cooperation.

Very truly yours,

Joe  
Joseph Thomas  
Law Office of Joseph Thomas PLLC  
14625 SE. 176th ST., Apt. # N101

Renton, Washington 98058

Phone: (206) 390-8848

Website: <http://JoeThomas.org>

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